

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ATC HEALTHCARE SERVICES, LLC,)	
)	
Plaintiff,)	
)	CASE NO. 1:23-CV-392
v.)	
)	
FRONTLINE HEALTHCARE STAFFING,)	JUDGE CHARLES E. FLEMING
LLC, <i>et al.</i>)	
)	IT IS SO ORDERED.
Defendants.)	<u>s/Charles E. Fleming</u>
)	United States District Judge
)	Dated: June 16, 2023
)	

**DEFENDANT FRONTLINE HEALTHCARE STAFFING, LLC’S
MOTION TO FILE COMMERICALLY SENSITIVE INFORMATION UNDER SEAL**

Pursuant to Local Rule 5.2, Defendant Frontline Healthcare Staffing, LLC (“Frontline”) makes this motion to file its Corporate Disclosure Statement under seal.¹ Counsel for Plaintiff does not object to Frontline filing this information under seal on the condition that Plaintiff’s counsel receives the information. Frontline agrees to provide the corporate disclosure statement to Plaintiff’s counsel with an AEO designation pursuant to the parties Joint Stipulated Protective Order.

I. INTRODUCTION

Frontline’s membership structure includes commercially sensitive information. Frontline requests that this information be filed under seal for three reasons. *First*, the corporate disclosure statement details the confidential structure of Frontline’s ownership and membership, including the identities of its members. This is commercially sensitive information that will harm Frontline if disclosed. Further, these members are not parties to this litigation, and their privacy interests

¹ All other defendants have filed their corporate disclosure statements. Plaintiff has also filed its disclosure statement.